

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
WESTERN DIVISION**

UNITED STATES OF AMERICA)
)
)
v.) Case No.: 7:21-cr-00324-LSC-GMB
)
)
FREDDIE JAMES WARD)

**MR. WARD'S SENTENCING MEMORANDUM AND MOTION FOR
DOWNWARD VARIANCE**

COMES NOW Freddie James Ward, through counsel, and hereby submits the following sentencing memorandum for the Court's consideration. For the reasons that follow, Mr. Ward requests a sentence of not more than twelve months and one day in custody.

Mr. Ward is a young man full of potential. At only twenty-two years old, Mr. Ward has his entire adult life ahead of him. To prepare for that future, Mr. Ward has been enrolled at Stillman College pursuing an Associate's Degree in Education, and he is proud to graduate next month. PSR, ¶ 53. Mr. Ward has a passion for sports, especially basketball. He intends to use his degree to pursue a career in coaching youth sports.

Among the statutory purposes of sentencing that the Court should consider is "the history and characteristics of the defendant." 18 U.S.C. § 3553(e)(1). A sentence of not more than twelve months and one day would take into account Mr. Ward's early acceptance of responsibility. He pleaded guilty by way of an information, allowing the government to forego presenting the case to a grand jury and allocate its resources more efficiently. Additionally, Mr. Ward has never been to prison before. As a young man, Mr. Ward's time in custody has the potential to be more difficult than it might be for an older, more experienced person, and the requested sentence takes this fact into account. For this same reason, a sentence of not more than twelve months and one day would

“afford adequate deterrence to criminal conduct.” 18 U.S.C. § 3553(a)(2)(B). Mr. Ward’s lack of prior incarceration means that any prison time will have a significant impact upon him.

For all of these reasons, Mr. Ward requests a sentence of not more than twelve months and one day in custody.

Respectfully submitted,

KEVIN L. BUTLER
Federal Public Defender
Northern District of Alabama

/s/John F. Cockrell

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CERTIFICATE OF SERVICE

I hereby certify that on April 25, 2022 I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all parties of record.

Respectfully submitted,

/s/John F. Cockrell
John F. Cockrell